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15 *Genesis Home Health Services, Inc.*
16 and *Querubin Iguban, Jr., M.D.*

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

12 NEW HORIZON HOME CARE, LLC, and
13 GUIDING LIGHT HOSPICE, INC.,

Case No.: 3:19-cv-00521-RCJ-WGC

14 Plaintiffs,

15 vs.
16 NORTHEASTERN NEVADA REGIONAL
17 HOSPITAL, HORIZON HOSPICE, INC.,
18 GENESIS HOSPICE, LLC, GENESIS
19 HOME HEALTH SERVICES, INC.,
20 HIGHLAND MANOR, DREW BANFORD,
BILLIE JEAN CRAWFORD, TRAVIS
SPENCER, QUERUBIN IGUBAN, JR.,
M.D., DEBRA ANDERSON,
MARISELLA (CHELLA) ELLIOT,
ALICE ALLEN,

**STIPULATION AND REQUEST FOR
EXTENSION OF TIME
[SECOND REQUEST]**

21 Defendants.
22 /

23 Defendants, GENESIS HOME HEALTH SERVICES, INC., a Nevada Corporation, and
24 QUERUBIN IGUBAN, JR., M.D., by and through their counsel GARY E. DI GRAZIA, Esq. of
25 the law firm of GOICOECHEA, DI GRAZIA, COYLE & STANTON, LTD., pursuant to FRCP
26 6(b)(1)(A) and LR IA 6-1, respectfully request this Court for an extension of time until
27 December 13, 2019 to provide a responsive pleading to Plaintiffs' Complaint in the above-
28 entitled matter for each of the following reasons:

1 1. Defendants were notified yesterday afternoon that there will be insurance
2 coverage and that assigned counsel would be confirmed after conflicts are checked;

3 2. As a result of the foregoing, an additional fourteen (14) days to respond to
4 Plaintiffs' Complaint is requested;

5 3. This is Defendants' second request for extension of time, having sought an
6 additional fourteen (14) days initially;

7 4. The time extension being sought is for the same period previously permitted to
8 Defendant, Northeastern Nevada Regional Hospital; and,

9 5. Counsel for Plaintiffs is not opposed to extend the time as described above.

10 **DATED:** November 22, 2019.

DATED: November 22, 2019.

11 **GOICOECHEA, DI GRAZIA,**
COYLE & STANTON, LTD.
12 *Attorneys for Defendants,*
Genesis Home Health Services, Inc. and
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16 By: /s/ Gary E. Di Grazia
17 **GARY E. DI GRAZIA**
18 **Nevada Bar No. 198**
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21 By: /s/ (Electronic Signature Authorized)
22 **STEPHEN S. KENT**
23 **Nevada Bar No. 1251**
24 **skent@skentlaw.com**

25 **IT IS SO ORDERED:**

26 
27 **UNITED STATES MAGISTRATE JUDGE**

28 **DATED: November 25, 2019**